

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FIREHAWK AEROSPACE, INC,

Plaintiff,

v.

JOLENE JONES,

Defendant.

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Civil Action No. 3:25-cv-01005-X

BRIEF IN SUPPORT OF PLAINTIFF’S MOTION FOR CONTEMPT

NOW COMES Plaintiff Firehawk Aerospace, Inc. (“Firehawk”) and respectfully submits this Brief to the Court in support of its pending Motion for Contempt of the Court’s Preliminary Injunction and for violation of the Temporary Restraining Order and would show the Court as follows:

I. BACKGROUND

Plaintiff’s company is a defense contractor to the United States government. Defendant was an employee of Plaintiff and was terminated in April 2024.

After termination, the Defendant initiated a lengthy, ongoing attack on social media against Plaintiff, its officers, employees and investors, in which the Defendant improperly disseminated confidential information belonging to the Plaintiff and in which Defendant defamed many people and made multiple true threats of violence against, among others, the Chief Executive Officer of Firehawk Aerospace, Inc., and his wife.

This Court entered a Temporary Restraining Order on the 8th day of May, 2025 [Document 10], and an Order granting a Preliminary Injunction on the 16th day of May, 2025 [Document 14].

Those orders prohibited, among other things, harassing Plaintiff, its officers, directors, employees and others. Despite this Court's order of injunction, the Defendant has continued to harass many of those persons or entities and, particularly, Will Edwards and his wife. Mr. Edwards is the Chief Executive Officer of Firehawk. In engaging such harassing tactics, the Defendant has also utilized confidential information, in violation of this Court's injunction, and in violation of her own contractual employment agreement.

II. EVIDENCE

The evidence upon hearing will include the oral testimony of Mr. Edwards and the presentation of several exhibits which include the Defendant's utterances in various postings. The harassing nature of those statements will be self-evident; however, Plaintiff respectfully submits this brief to address any concern regarding First Amendment rights.

Defendant has made multiple "true threats" in her publications. One posting made in the last few days states that she will "burn down" the home of anyone who "crosses" her. In another posting, she "roleplays" herself shopping in a gun store while using the word "kill" in her rambling remarks.

The Defendant's postings have created fear on the part of Mr. Edward's wife, to the degree that she and Mr. Edwards have moved from their home into a safer locale. The Defendant had knowledge of Edwards' prior residence, having visited there earlier, and Mr. Edwards' wife did not feel safe in the prior home inasmuch as Mr. Edwards travels internationally and frequently.

The First Amendment offers no protection to "true threats" of violence. That this circuit has, just last month, handed down the opinion in *United States v. Jubert* 139 F.4th 484(5th Cir. 2025) which stands for this proposition. That opinion cites the United States Supreme Court

decision of *Counterman v. Colorado*, 600 U.S. 66 (2023) which, of course, makes clear that the highest court in our land recognizes this exception to the First Amendment protection.

Accordingly, while there can be no question that Defendant has violated the injunction by her lengthy, harassing and ongoing efforts, we respectfully submit this brief to the Court to assuage any concerns about First Amendment issues.

III. CONCLUSION

Accordingly, upon hearing of Plaintiff's Motion for Contempt, Plaintiff respectfully prays that the Court will hold the Defendant in contempt of this Court's prior orders and impose appropriate sanctions upon the Defendant, including an award of reasonable and necessary attorneys' fees and costs of court.

Respectfully submitted,

/s/ Frank Hill

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**ATTORNEY FOR PLAINTIFF
FIREHAWK AEROSPACE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all parties of record on July 25, 2025, in accordance with the Federal Rules of Civil Procedure.

/s/ Frank Hill

Frank Hill